

Exhibit 31

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*, Case No. 18-op-45090
*City of Cleveland, Ohio, et al. v. Purdue
Pharma L.P., et al.*, Case No. 18-op-451312
*County of Cuyahoga, Ohio, et al. v. Purdue
Pharma L.P., et al.*, Case No. 17-op-45004

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**ALLERGAN'S CORRECTED AND AMENDED VERIFIED RESPONSES TO
PLAINTIFFS' ADDITIONAL 30(B)(6) QUESTIONS**

Allergan offered Stephen Kaufhold as its 30(b)(6) witness to testify about three discreet topics:

- The corporate structure of all Allergan entities (including Allergan Finance, LLC, Allergan plc, and all subsidiaries, parents, predecessors, successors, and/or associated entities resulting from any and all mergers over the years) and each such entity's involvement with any opioid products from 1995 to the present, including the identification of all drugs, the entity's role in connection with such drugs, and all opioid management involved.
- The management of the generic opioid business from 1995 to the present for all Allergan entities (including Allergan Finance, LLC, Allergan plc, and all subsidiaries, parents, predecessors, successors, and/or associated entities resulting from any and all mergers over the years) and all generic opioids for which any Allergan entities had any involvement.
- All involvement and communications Allergan plc has had with any of its subsidiaries involved in the licensing, manufacture, marketing, sale, or distribution of any opioid products, including Allergan plc's ownership interests in, control over, and financial interrelationships with any such subsidiaries, as well as how subsidiaries' management interacted with and reported to Allergan plc and how this changed over time.

During his deposition, Mr. Kaufhold answered hours of questions about Allergan's branded opioids (Kadian® and Norco®) as well as the generics companies that formerly were affiliated with Allergan but now are owned by Teva (the "Actavis Generic Entities"). As part of his testimony, Mr. Kaufhold presented Plaintiffs with a 14-page written overview setting forth

comprehensive responses to each of the topics (Kaufhold Dep. Ex. 3, attached). Nevertheless, after the deposition, Plaintiffs selected the handful of questions that Mr. Kaufhold was unable to answer as they were worded, and complained to the Special Master that the responses were being withheld from them. It is Allergan's position that these specific questions as they were asked in the deposition were beyond the scope of the topics upon which Mr. Kaufhold was designated to discuss, and beyond the level of detail required of a witness being offered on "corporate structure." However, in the spirit of cooperation and in interest of expeditiously resolving any remaining disputes regarding this matter, Allergan submits the following verified responses to the specific additional questions Plaintiffs have posed.

Affirmation That Discovery Responses Herein Are Submitted On Behalf of All Current Allergan Entities And Include Information Collected About Prior Affiliates No Longer Owned by Allergan

These responses are made on behalf of Allergan Finance, LLC and Allergan plc -- a foreign corporation which has not been served (collectively Allergan). Allergan confirms that it's previous and ongoing discovery investigation and production of documents -- regarding Kadian®, Norco®, and generic opioids manufactured and/or sold by the Actavis Generics Entities sold to Teva (and where appropriate, "opioids generally" or unbranded marketing) -- has included all responsive documents and information reasonably accessible to all of its current affiliates, including Allergan plc.

OCT. 29 M. MELAMED LETTER TO J. LEVY LETTER QUESTION 1:

Which Allergan entities spent money on research, development, marketing, and other costs of sales for each of Allergan's opioid products, on a product-by-product and year-by-year basis?

ALLERGAN'S RESPONSE TO OCT. 29 QUESTION 1:

IP Ownership:

Kadian's NDA was held by three entities since Allergan acquired it—Actavis Elizabeth, LLC (2008-2013); Actavis Laboratories Utah, Inc. f/k/a Watson Laboratories, Inc. Utah (2013-2016); Allergan Sales, LLC (2016-present).

Norco's ANDAs were held by Watson Laboratories, Inc. (approval or acquisition-2015); Allergan Sales, LLC (2016), and Allergan Pharmaceuticals International Ltd. (2017-Present).

Based upon our investigation, a complete list of Schedule II opioids owned by the various Actavis Generic Entities can be found in Exhibit 3 of Steve Kaufhold's 30(b)(6) Deposition, attached.

Manufacturing Function:

Between Allergan's acquisition of Kadian® and the sale of the Actavis Generic Entities to Teva, Actavis Elizabeth, LLC manufactured Kadian®. Based on a review of reasonably available Norco® labels dating back to 2003, the following entities were involved in the manufacture or distribution of Norco®—Watson Pharma, Inc., Watson Laboratories, Inc., Warner Chilcott Co. LLC, Allergan USA, Inc., and Allergan Sales, LLC.

After the sale of the Actavis Generic Entities to Teva in 2016, Allergan and Teva entered into an agreement whereby Teva would continue to manufacture Kadian® and Norco® on Allergan's behalf.

Based on our investigation, it appears that the manufacturing entity of the generic opioids sold by the Actavis Generic Entities closely tracked the IP holder identified in Exhibit 3 to Steve Kaufhold's 30(b)(6) Deposition. See Acquired_Actavis_00263048; Acquired_Actavis_00191175; Acquired_Actavis_00981933; Acquired_Actavis_00596409; Acquired_Actavis_00984814; Acquired_Actavis_00681839; Acquired_Actavis_00356941; Acquired_Actavis_01282892.

Marketing:

Actavis Kadian, LLC signed a marketing contract with Ventiv Commercial Services, LLC in May 2009. Under the contract, Ventiv Commercial Services, LLC employed a sales force to market Kadian®. That sales force was disbanded at the end of 2012. Between April 2009 and September 2012, Actavis Kadian, LLC contracted with TMS Health to provide telemarketing services. Between 2012 and 2013, Actavis (no comma) Inc. (Watson Pharma, Inc. was substituted in for Actavis Inc. in 2013) contracted with Technekes, LLC to provide telemarketing services for Kadian®. All telesales of Kadian ceased in 2013.

Norco® marketing activities ceased fifteen years ago in 2003. Despite a diligent search of all reasonably available materials, Allergan is unable to determine which specific Watson entity employed the Norco® sales force.

The Inventiv Kadian® sales force also mentioned the availability of generic oxymorphone in sales calls from July 2011 to September 2011 and mentioned the availability of generic Kadian® from November 2011 to December 2012. In addition, Watson Laboratories, Inc., Watson Pharma, Inc. and Watson Pharmaceuticals, Inc. issued product alerts for certain products. See ALLERGAN_MDL_01144537, ALLERGAN_MDL_01497607, ALLERGAN_MDL_01683855, and ALLERGAN_MDL_03733546. Based on our investigation to date, Allergan is not aware of any other entity that engaged in generic marketing.

OCT. 29 M. MELAMED LETTER TO J. LEVY LETTER QUESTION 2:

Which Allergan entities made payments to lobbyists related to opioids, on a year-by-year (and, where relevant, a product-by-product) basis?

ALLERGAN'S RESPONSE TO OCT. 29 QUESTION 2:

Allergan has not engaged in lobbying efforts regarding opioids. Allergan believes that the only activity its registered lobbyists have ever engaged in related to opioids was attendance at a

meeting in New Jersey between 2011 and 2013 with a member of the New Jersey Legislature in which abuse deterrent opioids were discussed. At the time, New Jersey was considering how to regulate abuse deterrent opioids as compared to other opioids. Allergan was not an active participant at the meeting and neither spoke nor submitted information related to this issue. Aside from this meeting, Allergan knows of no other involvement that its lobbyists have ever had with respect to opioids. Allergan is also unaware of any opioid-related lobbying activities undertaken by the Actavis Generics entities.

OCT. 29 M. MELAMED LETTER TO J. LEVY LETTER QUESTION 3:

Which Allergan entities made payments of any kind related to opioids, and when such payments were made, to the American Pain Foundation, American Academy of Pain Medicine, American Pain Society, Federation of State Medical Boards, Alliance for Patient Access, U.S. Pain Foundation, or the U.S. Geriatrics Society?

ALLERGAN'S RESPONSE TO OCT. 29 QUESTION 3:

Allergan knows of no payments made to any of these organizations on behalf of current Allergan entities related to Kadian®, Norco®, or opioids generally. Dr. Barrett testified that Actavis joined the corporate council of the American Pain Society in preparation for the launch of Moxduo, a product that never came to market. Allergan is not aware of any other payments made to these organizations by the Actavis Generic Entities.

OCT. 29 M. MELAMED LETTER TO J. LEVY LETTER QUESTIONS 4, 5 & 6:

Which Allergan entities employed individuals who sold any of Allergan's generic opioid products on a year-by-year basis?

Which Allergan entities employed individuals who marketed generic opioids to distributors and pharmacies on a year-by-year basis?

Which Allergan entities employed individuals who marketed or detailed generic opioids to physicians and other healthcare providers, prior to the Teva sale, on a year-by-year basis?

ALLERGAN'S RESPONSE TO OCT. 29 QUESTIONS 4, 5 & 6:

The corporate entities who sold generics opioids during the period of time when the Actavis Generic Entities were affiliated with Allergan were Watson Laboratories, Inc.; Actavis Laboratories Utah, Inc. f/k/a Watson Laboratories, Inc. Utah; Actavis Elizabeth, LLC; Actavis South Atlantic LLC; Actavis Mid Atlantic LLC; Actavis Totowa LLC; and Actavis Laboratories Florida, Inc. f/k/a Watson Laboratories, Inc. - Florida.

The Inventiv Kadian® sales force mentioned the availability of generic oxymorphone in sales calls from July 2011 to September 2011 and mentioned the availability of generic Kadian® from November 2011 to December 2012. In addition, Watson Laboratories, Inc., Watson Pharma, Inc. and Watson Pharmaceuticals, Inc. issued product alerts for certain products. See ALLERGAN_MDL_01144537, ALLERGAN_MDL_01497607, ALLERGAN_MDL_01683855, and ALLERGAN_MDL_03733546. Based on our investigation to date, Allergan is not aware of any other entity that engaged in generic marketing.

OCT. 29 M. MELAMED LETTER TO J. LEVY LETTER QUESTIONS 7 & 8:

Which Allergan entities employed individuals who marketed Kadian® to physicians and other healthcare providers on a year-by-year basis?

Which Allergan entities employed individuals who detailed Kadian® to physicians and other healthcare providers on a year-by-year basis?

ALLERGAN'S RESPONSE TO OCT. 29 QUESTIONS 7 & 8:

Actavis Kadian, LLC signed a marketing contract with Ventiv Commercial Services, LLC in May 2009. Under the contract, Ventiv Commercial Services, LLC employed a sales force to market Kadian®. That sales force was disbanded at the end of 2012. Between April 2009 and September 2012, Actavis Kadian, LLC contracted with TMS Health to provide telemarketing services. Between 2012 and 2013, Actavis (no comma) Inc. (Watson Pharma, Inc. was substituted in for Actavis Inc. in 2013) contracted with Technekes, LLC to provide telemarketing services for Kadian®. All telesales of Kadian ceased in 2013.

OCT. 29 M. MELAMED LETTER TO J. LEVY LETTER QUESTIONS 9 & 10:

Which Allergan entities employed individuals who marketed Norco® to physicians and other healthcare providers on a year-by-year basis?

Which Allergan entities employed individuals who detailed Norco® to physicians and other healthcare providers on a year-by-year basis?

ALLERGAN'S RESPONSE TO OCT. 29 QUESTIONS 9 & 10:

Norco® marketing activities ceased fifteen years ago in 2003. Despite a diligent search of all reasonably available materials, Allergan is unable to determine which specific Watson entity employed the Norco® sales force.

OCT. 29 M. MELAMED LETTER TO J. LEVY LETTER QUESTIONS 11 & 12:

Which Allergan entities employed individuals who worked on regulatory issues concerning opioids on a year-by-year basis?

Which Allergan entities worked on issues related to suspicious order monitoring of the sales of Allergan's opioids on a year-by-year basis?

ALLERGAN'S RESPONSE TO OCT. 29 QUESTIONS 11 & 12:

Allergan Sales, LLC currently employs the department that handles regulatory issues for Kadian® and Norco®. Since 2016, Allergan contracts with UPS SPS, Inc. to distribute Kadian® and Norco® on its behalf. Allergan currently does not have a DEA license to manufacture or distribute Schedule II substances.

The following Actavis Generic Entities had or have a DEA license to manufacture or distribute Schedule II substances: Actavis Laboratories Utah, Inc. f/k/a Watson Laboratories, Inc. Utah; Actavis Laboratories Florida, Inc. f/k/a Watson Laboratories, Inc. - Florida; Watson Laboratories, Inc.; Actavis Pharma, Inc. f/k/a Watson Pharma, Inc.; Actavis Elizabeth, LLC; Actavis Mid Atlantic LLC; Actavis LLC; Warner Chilcott Co., LLC. *See* Acquired_Actavis_002059998.

OCT. 29 M. MELAMED LETTER TO J. LEVY LETTER QUESTION 13:

Which entities booked revenues or expenses related to Allergan's opioid products on a year-by-year basis?

ALLERGAN'S RESPONSE TO OCT. 29 QUESTION 13:

Currently, Allergan USA, Inc. books revenue related to Norco® and Kadian®. Previously, Actavis Pharma, Inc. f/k/a Watson Pharma, Inc. booked revenue for Kadian®, Norco®, and the generic opioids sold by the Actavis Generic Entities.

OCT. 29 M. MELAMED LETTER TO J. LEVY LETTER QUESTIONS 14 & 15:

Which Allergan entity employs the executives of Allergan plc?
Which Allergan entity pays the executives of Allergan plc?

ALLERGAN'S RESPONSE TO OCT. 29 QUESTIONS 14 & 15:

Allergan Sales, LLC pays and employs Allergan plc's Executive Leadership Team.

***LEGALLY PRIVILEGED AND CONFIDENTIAL
ATTORNEY WORK PRODUCT***

VERIFICATION

Stephen Kaufhold states that he is authorized to sign on behalf of Allergan Finance, LLC (f/k/a Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc.) and declares that he has read the responses; that statements made herein were prepared by Allergan Finance, LLC's counsel based upon available information; that said responses are subject to inadvertent or undiscovered errors, are based in part on personal knowledge and to the extent not based on personal knowledge, are limited by the documents and information still in existence and in the possession of Allergan, presently recollected and thus far discovered in the course of the preparation of these responses; that, consequently, Allergan Finance, LLC reserves the right to make changes to the Responses if it appears at any time that omissions or errors have been made therein, or that more accurate information is available; and that, subject to the limitations set forth therein, Allergan Finance, LLC believes that such statements are true and correct to the best of its information and belief known at this time. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 20, 2018

/s/ 
Stephen Kaufhold



NORCO

IP 2000-2015 – Watson Laboratories, Inc. now known as Actavis
Laboratories Florida
2016 – Allergan Sales, LLC
2017 – Present Allergan Pharmaceuticals Limited (APIL)

MFS < July 2015 Watson Laboratories, Inc. (Nevada)
> July 2015 Warner Chilcott Company, LLC (Puerto Rico)
divested to Teva August 2016

Sales Prior Actavis Pharma, Inc. formerly known as Watson Pharma, Inc.
current Allergan USA, Inc.

KADIAN

IP 12/08 – 13 – Actavis Elizabeth LLC
2013 – 2016 – Actavis Laboratories Utah formerly known as Watson
Laboratories Salt Lake
2016 – Allergan Sales, LLC

MFS Actavis Elizabeth TPM to Alpharma since 12/19/2005
Actavis Elizabeth acquired Product in December 2008
Continues to supply Allergan USA, Inc.

Sales Previous Actavis Pharma, Inc. formerly known as Watson Pharma, Inc.
Today Allergan USA, Inc.

Steve Kaufhold: Information collected in response to Plaintiffs' 30(b)(6) Notice

NO	Topic	Response
43.1	The corporate structure of all Allergan entities (including Allergan Finance, LLC, Allergan plc, and all subsidiaries, parents, predecessors, successors and/or associated entities resulting from any and all mergers over the years) and each such entity's involvement with any opioid products from 1995 to the present, including the identification of all drugs, the entity's role in connection with such drugs, and all opioid management involved.	<p data-bbox="1136 269 1386 302"><u>Corporate History</u></p> <p data-bbox="600 334 1398 367">See provided graphic laying out Allergan's transactional history.</p> <p data-bbox="1125 399 1398 431"><u>Corporate Structure</u></p> <p data-bbox="600 464 1759 894">The corporate structure of all the entities identified below is shown in the following corporate organizational charts: 2011-01-05 ALLERGAN_MDL_03367307; 2011-01-21 ALLERGAN_MDL_03367302; 2012-10-12 ALLERGAN_MDL_03367301; 2012-11-30 ALLERGAN_MDL_02761472; 2012-12-31 ALLERGAN_MDL_03367304; 2013-01-24 ALLERGAN_MDL_02758853; 2013-06-30 ALLERGAN_MDL_02931208; 2013-10-01 ALLERGAN_MDL_01098786; 2014-01-31 ALLERGAN_MDL_01384578; 2014-06-30 ALLERGAN_MDL_03295845; 2014-12-31 ALLERGAN_MDL_02177059; 2015-01-01 ALLERGAN_MDL_02079795; 2015-09-08 ALLERGAN_MDL_01471538; 2015-09-30 ALLERGAN_MDL_02147315; 2016-01-01 ALLERGAN_MDL_01373731; 2016-03-31 ALLERGAN_MDL_02147111; 2016-08-03 ALLERGAN_MDL_03295865; 2016-09-30 ALLERGAN_MDL_03295869; 2017-06-30 ALLERGAN_MDL_00000006; 2017-08-01 ALLERGAN_MDL_00000001; 2018-03-31 ALLERGAN_MDL_03295860.</p> <p data-bbox="600 927 1293 959">Key Chart - 08-02-2016 ALLERGAN_MDL_03674501</p> <p data-bbox="1089 992 1432 1024"><u>Involvement with Opioids</u></p> <p data-bbox="600 1057 1073 1089">Transferred Entities/IP Ownership:</p> <p data-bbox="600 1122 1902 1260">Allergan sold its generic businesses to Teva in 2016. Teva - Allergan MPA (ALLERGAN_MDL_01481207). As part of that transaction, Allergan sold a number of entities to Teva that were involved with generic opioids. The following entities sold to Teva were listed as the ANDA or NDA holders for the following schedule II opioid products (see FDA "Orange Book"):</p> <ol data-bbox="699 1292 1104 1325" style="list-style-type: none"> 1. Watson Laboratories, Inc.

NO	Topic	Response
		<p>(a) Fentanyl citrate injection (ANDA # 074917)</p> <p>(b) Fentanyl citrate table (ANDA # 079075)</p> <p>(c) Fentanyl transdermal (ANDA # 076709)</p> <p>(d) Hydrocodone / acetaminophen (ANDA #s 081083; 081080; 081079; 040094; 040122; 040123; 040099; 040148; 089883; 040248)</p> <p>(e) Meperidine Hydrochloride Injection (ANDA #s 073443; 073444; 073445)</p> <p>(f) Meperidine Hydrochloride Tablet (ANDA #s 040186)</p> <p>(g) Morphine sulfate injection (ANDA #s 073373; 073374; 073375; 073376)</p> <p>(h) Morphine sulfate capsule (ANDA #s 200812)</p> <p>(i) Oxycodone / acetaminophen (ANDA #s 040234; 040171; 040371; 040535)</p> <p>(j) Oxycodone / aspirin (ANDA #s 040255; 090084)</p> <p>(k) Oxycodone / ibuprofen (ANDA # 078394)</p> <p>(l) Morphine sulfate tablet (ANDA # 075656)</p> <p>2. Actavis Laboratories FL, Inc. f/k/a Watson Laboratories, Inc. - Florida</p> <p>(a) Hydrocodone / acetaminophen (ANDA #s 040493; 040494; 040495; 040148¹; 206470)</p> <p>(b) Hydrocodone / ibuprofen (ANDA #s 077454; 076604)</p>

¹ Some products are listed under more than one entity if the ANDA or NDA transferred between the entities.

NO	Topic	Response
		<p>(c) Oxycodone / aspirin (ANDA # 090084)</p> <p>(d) Hydromorphone tablet (ANDA # 202144)</p> <p>3. Actavis Totowa LLC</p> <p>(a) Oxycodone / acetaminophen (ANDA #s 040203; 040199; 040800)</p> <p>(b) Homatropine methylbromide / hydrocodone bitartrate (ANDA # 040295)</p> <p>(c) Oxycodone / hydrochloride tablet (ANDA # 076636)</p> <p>4. Actavis Elizabeth LLC</p> <p>(a) Oxycodone / acetaminophen (ANDA #s 040203; 040199; 040800; 201447)</p> <p>(b) Homatropine methylbromide / hydrocodone bitartrate (ANDA # 040295)</p> <p>(c) Morphine sulfate capsule (ANDA #s 020616; 079040)</p> <p>(d) Morphine sulfate tablet (ANDA # 203849)</p> <p>(e) Oxycodone / hydrochloride tablet (ANDA # 076636)</p> <p>(f) Oxycodone / ibuprofen (ANDA # 078769)</p> <p>(g) Oxymorphone tablet (ANDA # 079046)</p> <p>5. Actavis Mid Atlantic LLC</p> <p>(a) Homatropine methylbromide / hydrocodone bitartrate (ANDA # 088017)</p> <p>6. Actavis Laboratories UT, Inc. f/k/a Watson Laboratories, Inc. Salt Lake City</p>

NO	Topic	Response
		<p>(a) Morphine sulfate capsule (NDA # 020616)</p> <p>7. Actavis South Atlantic LLC</p> <p>(a) Oxymorphone tablet (ANDA # 079046)</p> <p>(b) Fentanyl transdermal (ANDA # 077602)</p> <p>Remaining Allergan Entities:</p> <p><u>Kadian®</u>: From December 19, 2005, until it purchased the medication, Actavis Elizabeth LLC served as the contract manufacturer of Kadian® for Alpharma. February 2, 2008 Actavis Elizabeth and Alpharma Contract (ALLERGAN_MDL_01076982); December 19, 2005, Alpharma - Purepac Contract (ALLERGAN_MDL_01474803).</p> <p>Actavis Elizabeth LLC acquired Kadian® from Alpharma in December 2008. December 17, 2008 Asset Purchase Agreement by and between King Pharmaceuticals, Inc. and Actavis Elizabeth, L.L.C. (ALLERGAN_MDL_01514893).</p> <p>The holders of the Kadian® NDA (020616) since December 2008 were and are (see FDA “Orange Book”):</p> <ul style="list-style-type: none"> December 2008-2013: Actavis Elizabeth LLC 2013-2016: Actavis Laboratories UT, Inc. f/k/a Watson Laboratories, Inc. - Salt Lake City 2016-Present: Allergan Sales, LLC <p>April 11, 2013 Transfer Letter (ALLERGAN_MDL_00811313); November 20, 2014, Company Name Change Letter (ALLERGAN_MDL_02195036); March 11, 2016 Transfer Letter (ALLERGAN_MDL_02197647).</p>

NO	Topic	Response
		<p>As part of the sale of its generic business to Teva, Teva agreed to continue manufacturing Kadian® and Norco for Allergan. Exhibit B of Teva-Allergan 2015 MPA (ALLERGAN_MDL_03367042). At that time, Allergan also contracted with UPS SCS, Inc. to distribute controlled substances, including Kadian® and Norco. 2015 UPS Allergan Contract ALLERGAN_MDL_01396729.</p> <p>Since December 2008, Kadian's label has identified the following entities as the manufacturer or distributor of Kadian®: Actavis Elizabeth LLC; Actavis Kadian LLC; Actavis Pharma, Inc.; and Allergan USA, Inc. 02/2009 Label (ALLERGAN_MDL_02200691); 02/2010 Label (ALLERGAN_MDL_01132982); 07/2012 Label²; 04/2014 Label³.</p> <p>The current label (revised 09/2018⁴) states that Kadian® is distributed by Allergan USA, Inc.; however, Allergan USA, Inc. does not distribute Kadian® itself. Instead, after Allergan sold the entities with the DEA-registrations required to produce and distribute schedule II controlled substances, Allergan USA, Inc. has contracted with UPS SCS, Inc. to distribute Kadian® on its behalf. 2015 UPS Allergan Contract (ALLERGAN_MDL_01396729).</p> <p><u>Norco</u>: The holders of the Norco ANDAs (40099 & 40148) were and are (<i>see</i> FDA "Orange Book"):</p> <p>ANDA 40099:</p> <ul style="list-style-type: none"> • 1997-1999: UCB Pharmaceuticals, Inc. • 2000-2015: Watson Laboratories, Inc. • 2016: Allergan Sales, LLC • 2017-Present: Allergan Pharmaceuticals International Limited

² https://www.accessdata.fda.gov/drugsatfda_docs/label/2012/020616s041lbl.pdf

³ https://www.accessdata.fda.gov/drugsatfda_docs/label/2014/020616s051lbl.pdf

⁴ https://www.allergan.com/assets/pdf/kadian_pi

NO	Topic	Response
		<p>ANDA 40148:</p> <ul style="list-style-type: none"> • 1997-2014: Watson Laboratories, Inc. • 2015: Actavis Laboratories FL, Inc. • 2016: Allergan Sales, LLC • 2017-Present: Allergan Pharmaceuticals International Limited <p>The following entities were involved in manufacturing and distributing Norco: Watson Pharma, Inc., Watson Laboratories, Inc., Warner Chilcott Company, LLC, Allergan USA, Inc., and Allergan Sales, LLC. 04/2002 Label (ALLERGAN_MDL_01095947); April 2003 Label (ALLERGAN_MDL_01095940); 07/2007 Label (ALLERGAN_MDL_01680965); 10/2009 Label (ALLERGAN_MDL_02206790); 06/2011 Labels (ALLERGAN_MDL_02209823; ALLERGAN_MDL_02210219); 08/2012 Label (ALLERGAN_MDL_01768757); 08/2013 Labels (ALLERGAN_MDL_02210402; ALLERGAN_MDL_02209867); 2014 Labels⁵; 02/2017 Label (ALLERGAN_MDL_02219168); Current Label⁶.</p> <p>Similar to Kadian®, after Allergan sold the entities with the DEA-registrations required to produce and distribute schedule II controlled substances, Allergan contracted with Teva and UPS, SCS Inc. to manufacture and distribute Norco on behalf of Allergan USA, Inc. and Allergan Sales, LLC. 2015 UPS Allergan Contract (ALLERGAN_MDL_01396729); Exhibit B of Teva-Allergan 2015 MPA (ALLERGAN_MDL_03367042).</p> <p><u>Other Schedule II Branded Drugs:</u> Between 2004 and 2006, Watson Pharmaceuticals, Inc., collaborated with Interpharm, Inc. (the ANDA holder) in the marketing and sale of Reprexain (ANDA 076642 - Hydrocodone bitartrate / ibuprofen). June 07, 2004 Email & Press Release Announcing Launch</p>

⁵ https://www.accessdata.fda.gov/drugsatfda_docs/label/2014/040099Orig1s018lbl.pdf;

https://www.accessdata.fda.gov/drugsatfda_docs/label/2014/040148s053lbl.pdf

⁶ https://www.allergan.com/assets/pdf/norco_pi

NO	Topic	Response
		<p>(ALLERGAN_MDL_01830938; ALLERGAN_MDL_01830941); June 14, 2006 Email Discussing No Longer Promoting Reprexain (ALLERGAN_MDL_01728789).</p> <p>On October 12, 2000, Watson Pharma, Inc. announced the addition of Maxidone (40094 - hydrocodone bitartrate / acetaminophen) to its product portfolio. October 12, 2000 Product Introduction Notification (ALLERGAN_MDL_02579713). Since 2015, Maxidone has been included on the FDA's list of discontinued drugs. (<i>See</i> 2015 FDA Orange Book, "Discontinued Drug Product List").</p> <p>Actavis acquired Forest Laboratories, Inc. in 2014. Prior to the acquisition, Forest Laboratories, Inc. sold a product called Combunox (021378 - Oxycodone Hydrochloride / ibuprofen). Forest received approval for Combunox on November 26, 2004. Since 2012, Combunox has been included on the FDA's list of discontinued drugs. (<i>See</i> 2012 FDA Orange Book, "Discontinued Drug Product List").</p>
43.2	<p>The management of the generic opioid business from 1995 to the present for all Allergan entities (including Allergan Finance, LLC, Allergan plc, and all subsidiaries, parents, predecessors, successors and/or associated entities resulting from any and all mergers over the years) and all generic opioids for which any Allergan entities had any involvement</p>	<p>Each of the seven entities identified above that had involvement with generic opioid medications is included on Schedule 4.6(g) of the Teva-Allergan MPA, which lists the entities transferred to Teva. Teva-Allergan MPA Schedules (ALLERGAN_MDL_03367048).</p> <p>The January 1, 2015, organization chart shows where each of these entities fell within the the corporate structure of Allergan prior to the sale to Teva. ALLERGAN_MDL_02079795. Actavis South Atlantic LLC, Actavis Elizabeth, LLC, Actavis Mid Atlantic LLC, and Actavis Totowa LLC were all direct subsidiaries of Actavis LLC, which was an indirect subsidiary of Watson Laboratories, Inc. <i>See id</i> at 2. Watson Laboratories, Inc. was a direct subsidiary of Actavis, Inc. n/k/a Allergan Finance, LLC. <i>See id</i>. Actavis Laboratories UT, Inc. was a direct subsidiary of Actavis, Inc. n/k/a Allergan Finance, LLC. <i>Id</i>. Actavis Laboratories FL, Inc. (f/k/a Watson Laboratories, Inc. - Florida) was a direct subsidiary of Andrx Corporation, which was a direct subsidiary of Actavis, Inc. n/k/a Allergan Finance, LLC. <i>Id</i>. Andrx Corporation and Actavis LLC, in addition to the seven generic ANDA-holding entities, were transferred to Teva. Teva-Allergan MPA Schedules (ALLERGAN_MDL_03367048).</p> <p>Prior to the sale of these entities to Teva, Actavis, Inc. n/k/a Allergan Finance, LLC did not manufacture, market, distribute, or sell any pharmaceutical products. It operated solely as a holding company. All of the direct subsidiaries of Actavis, Inc. n/k/a Allergan Finance involved in the management of the generic</p>

NO	Topic	Response
		<p>opioid business were transferred to Teva. No other affiliate of Allergan Finance LLC or Allergan plc had involvement with generic opioids.</p> <p><u>Officers & Directors of Generic Entities:</u></p> <p>Based on a review of reasonably available documents, we have identified the following persons as directors and officers of some of the entities identified above.</p> <p><u>Watson Pharma, Inc.</u></p> <p><u>7-24-2012:</u></p> <p>Director: Paul M. Bisaro;</p> <p>Officers: Paul M. Bisaro, G. Frederick Wilkinson, Robert A. Stewart, R. Todd Joyce, David A. Buchen, Ranjana B. Pathak, Andrew Boyer, Charles M. Mayr, Lynne Amato, Thomas R. Griffin, Tim Callahan, Diane Miranda, Kathleen Reape, Allan Slavsky, Michael W. Carr, Sigurd C. Kirk, James O'Brien, James A. Williamson, Brett W. Hagardorn.</p> <p><i>See ALLERGAN_MDL_03367292</i></p> <p><u>8-30-2013:</u></p> <p>Director: Paul M. Bisaro;</p> <p>Officers: Paul M. Bisaro, G. Frederick Wilkinson, Robert A. Stewart, R. Todd Joyce, David A. Buchen, Ranjana B. Pathak, Andrew Boyer, Charles M. Mayr, Lynne Amato, Thomas R. Griffin, Tim Callahan, Kathleen Reape, Allan Slavsky, Michael W. Carr, Sigurd C. Kirk, James O'Brien, James A. Williamson, Brett W. Hagardorn, John Larocca.</p> <p><i>See ALLERGAN_MDL_03367295.</i></p> <p><u>Watson Laboratories, Inc.</u></p>

NO	Topic	Response
		<p><u>7-24-2012:</u></p> <p>Director: Paul M. Bisaro;</p> <p>Officers: Paul M. Bisaro, G. Frederick Wilkinson, Robert A. Stewart, R. Todd Joyce, David A. Buchen, Patrick G. Brunner, Charles D. Ebert, Ranjana B. Pathak, Nick Kerkhof, Gary Kozloski, Gary Holloway, Jeffery Regan, Beth Brennan, Kathleen Reape, Michael W. Carr, James O'Brien, James A. Williamson, Miguel A. Gomez, Brett W. Hagadorn, Roberta Loomar.</p> <p><i>See ALLERGAN_MDL_03367294.</i></p> <p><u>8-30-2013</u></p> <p>Director: Paul M. Bisaro;</p> <p>Officers: Paul M. Bisaro, G. Frederick Wilkinson, Robert A. Stewart, R. Todd Joyce, David A. Buchen, Patrick G. Brunner, Charles D. Ebert, Ranjana B. Pathak, Hafrun Fridriksdottir, Nick Kerkhof, Gary Kozloski, Gary Holloway, Jeffery Regan, Beth Brennan, Kathleen Reape, Michael W. Carr, James O'Brien, James A. Williamson, Miguel A. Gomez, Brett W. Hagadorn, John Larocca.</p> <p><i>See ALLERGAN_MDL_03367296.</i></p>
43.3	All involvement and communications Allergan plc has had with any of its subsidiaries involved in the licensing, manufacture, marketing, sale, or distribution of any opioid products, including Allergan plc's ownership interests in, control over, and financial interrelationships with any	<p>Allergan plc "was established for the purpose of facilitating the business combination between Allergan Finance, LLC (formerly known as Actavis, Inc.) and Warner Chilcott plc." Allergan plc 2017 10-K at 3. Allergan Finance, LLC acquired Warner Chilcott plc in a stock-for-stock transaction in 2013. 5/19/2013 Actavis, Inc. 8-K at 9. After the transaction, Warner Chilcott and Allergan Finance, LLC each became wholly owned, indirect subsidiaries of Allergan plc. Allergan plc 2017 10-K at 3.</p> <p>Allergan plc f/k/a Actavis plc is an Irish corporation and its only offices are located in Ireland. Allergan plc is a holding company that exists for the purpose of holding shares of other companies that manufacture and distribute prescription drugs rather than producing or selling its own goods or services. Allergan plc does not finance or control the daily affairs, including marketing or sales operations, of its subsidiaries.</p>

NO	Topic	Response
	such subsidiaries, as well as how subsidiaries' management interacted with and reported to Allergan plc and how this changed over time.	<p>The following individuals are or were the primary executives at Allergan Finance, LLC in the following categories at the specified time period:</p> <p><u>Watson Pharmaceuticals, Inc.</u></p> <p><u>Officers</u></p> <ul style="list-style-type: none"> (i) Chief Executive Officer: Allen Chao (1999-2008), Paul Bisaro (2008-2012) (ii) Chief Financial Officer: Michael Boxer (1999-2002), Charles Slacik (2003-2007), Mark Durand (2008-2009), R. Todd Joyce (2010-2012) (iii) Chief Operating Officer: Fred Wilkinson (1999-2000), Joseph Papa (2001-2004), Robert Stewart (2010-2012) (iv) General Counsel: Robert Funsten (1999-2001), David Buchen (2002-2012) (v) Sales: Lynne Amato (1999, 2003-2009), Carolyn Logan (1999), Andy Boyer (2003-2012), Tim Callahan (2010-2012) (vi) Marketing: Lynne Amato (1999, 2003-2012), Carolyn Logan (1999), Andy Boyer (2003-2012) (vii) Compliance: Roberta Loomar (2008-2010), Deborah Penza (2011-2012) (viii) Sales or Marketing Training: None (ix) Government Affairs: G. Thomas Long (2004-2010), Charlie Mayr (2011-2012) (x) Medical Director: Gary Kozloski (2001-2012) (xi) Research and Development: Charles Ebert (1999-2012), Francois Menard (2007-2012) <p><u>Directors</u></p> <ul style="list-style-type: none"> (i) Paul Bisaro (2007 - 2012) (ii) Christopher Bodine (2009 - 2012) (iii) Allen Chao (1983 - 2009) (iv) Michael Fedida (1995 - 2012) (v) Michael Feldman (1985 - 2012) (vi) Albert Hummel (1986 - 2012) (vii) Alec Keith (1991 - 2000) (viii) Catherine Klema (2004 - 2012) (ix) Jack Michelson (2002 - 2012)

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		<p>(x) Melvin Sharoky (1995 - 1998)</p> <p>(xi) Anthony Tabatznik (2009 - 2012)</p> <p>(xii) Ronald Taylor (1994 - 2012)</p> <p>(xiii) Andrew Turner (1997 - 2012)</p> <p>(xiv) Fred Weiss (2000 - 2012)</p> <p><u>Actavis, Inc.</u></p> <p><u>Officers:</u></p> <p>(i) Chief Executive Officer: Paul Bisaro (2013-2014), Brent Saunders (2015-2016)</p> <p>(ii) Chief Financial Officer: Todd Joyce (2013-2014), Tessa Hilado (2015-2016)</p> <p>(iii) Chief Operating Officer: Robert Stewart (2013-2016)</p> <p>(iv) General Counsel: David Buchen (2013-2014), A. Robert D. Bailey (2015-2016)</p> <p>(v) Sales: Andy Boyer (2013), Tim Callahan (2013), Siggi Olafsson (2013-2014), William Meury (2015-2016)</p> <p>(vi) Marketing: Andy Boyer (2013), Lynne Amato (2013), Siggi Olafsson (2013-2014), William Meury (2015-2016)</p> <p>(vii) Compliance: Debra Penza (2013-2014), Joseph Zimmerman (2014), Jonathon Kellerman (2015-2016)</p> <p>(viii) Sales or Marketing Training: None</p> <p>(ix) Government Affairs: Charlie Mayr (2013-2014), Alex Kelly (2015-2016)</p> <p>(x) Medical Director: Gary Kozlowski (2013), Gavin Corcoran (2014-2016)</p> <p>(xi) Research and Development: Chuck Ebert (2013-2014), Hafrun Fridriksdottir (2013-2014), David Nicholson (2015-2016)</p> <p><u>Directors</u></p> <p>(i) Paul Bisaro (2013-2014)</p> <p>(ii) Christopher Bodine (2013-2014)</p> <p>(iii) Michael Fedida (2013-2014)</p> <p>(iv) Michael Feldman (2013-2014)</p> <p>(v) Albert Hummel (2013-2014)</p> <p>(vi) Catherine Klema (2013-2014)</p>

NO	Topic	Response
		<p>(vii) Jack Michelson (2013-2014)</p> <p>(viii) Ronald Taylor (2013-2014)</p> <p>(ix) Andrew Turner (2013-2014)</p> <p>(x) Fred Weiss (2013-2014)</p> <p><u>Allergan Finance, LLC</u></p> <p><u>Officers</u></p> <p>Allergan Finance, LLC's management structure is set forth in the Second Amended and Restated Operating Agreement of Allergan Finance, LLC (ALLERGAN_MDL_SUPP_00000326). This Operating Agreement identifies the following officers:</p> <p>(i) A. Robert D. Bailey</p> <p>(ii) Matthew M. Walsh</p> <p>(iii) Jonathon Kellerman</p> <p>(iv) Karen Ling</p> <p>(v) Alex Kelly</p> <p>(vi) William Meury</p> <p>(vii) Sigurd Kirk</p> <p>(viii) Marc Princen</p> <p>(ix) James D'Arecca</p> <p>(x) Sean Lennon</p> <p>(xi) David Nicholson</p> <p>(xii) Lynne Bolduc</p> <p>(xiii) Thomas Poche</p> <p>(xiv) Brian Anderson</p> <p>(xv) Riccardo Mancuso</p> <p>(xvi) Martin Shindler</p> <p>(xvii) Wayne Swanton</p> <p>(xviii) Stephen M. Kaufhold</p> <p>(xix) Kira Schwartz</p> <p>(xx) Judith Tomkins</p>

NO	Topic	Response
		<p><u>Directors</u> Allergan Finance, LLC does not have a Board of Directors. Allergan Finance, LLC instead has a two-person Board of Managers that is comprised of A. Robert D. Bailey and Matthew M. Walsh.</p> <p><u>Allergan plc Board & Executive Leadership Team:</u></p> <p>10-02-2013⁷</p> <p><u>Directors:</u></p> <ul style="list-style-type: none"> (i) Paul M. Bisaro (ii) James H. Bloem (iii) Christopher Bodine (iv) Tamar D. Howson (v) John A. King (vi) Catherine M. Klema (vii) Jiri Michal (viii) Jack Michelson (ix) Sigurdur Oli Olafsson (x) Patrick J. O'Sullivan (xi) Andrew L. Turner (xii) Fred G. Weiss <p>Current Leadership:</p> <p><u>Executive Leadership Team:</u></p> <ul style="list-style-type: none"> (i) Brenton L. Saunders, Chairman, President and CEO (ii) William Meury, EVP & Chief Commercial Officer (iii) Matt Walsh, EVP & Chief Financial Officer (iv) A. Robert D. Bailey, EVP & Chief Legal Officer and Corporate Secretary (v) Karen L. Ling, Esq., EVP & Chief Human Resources Officer

⁷ <https://www.allergan.com/news/news/thomson-reuters/actavis-plc-names-board-of-directors>

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		<p>(vi) C. David Nicholson, PhD, EVP & Chief R&D Officer</p> <p>(vii) Alex Kelly, EVP & Chief Communications Officer</p> <p>(viii) Wayne R. Swanton, EVP, Global Operations</p> <p><u>Directors</u></p> <p>(i) Nesli Basgoz, M.D.</p> <p>(ii) Joseph H. Boccuzzi</p> <p>(iii) Christopher W. Bodine</p> <p>(iv) Adriane M. Brown</p> <p>(v) Christopher J. Coughlin</p> <p>(vi) Carol Anthony (John) Davidson</p> <p>(vii) Michael E. Greenberg, PhD</p> <p>(viii) Thomas C. Freyman</p> <p>(ix) Catherine M. Klema</p> <p>(x) Peter J. McDonnell, M.D.</p> <p>(xi) Fred G. Weiss</p>